# **EXHIBIT B**

From: arthur kim [akimhaiti@gmail.com]

Sent: Wednesday, May 14, 2008 1:32 PM

To: Louie, Alisha M. (Assoc-SV-LT)

Cc: danfeder@pacbell.net; Goines, William (Shld-SV-LT); Meier, Jeremy (Assoc-Sac-LT); prk@investigationlogic.com; mmg@hudginslaw.com

Subject: Re: FW: Otsuka v. Polo - deposition scheduling

# Alisha:

We will not be appearing at Ann Otsuka's deposition tomorrow. We have not been able to reach Ms. Otsuka yet, although we are still trying.

Best regards,

Arthur Kim

Law Offices of Daniel Feder

On Wed, Apr 30, 2008 at 11:39 AM, <<u>LouieA@gtlaw.com</u>> wrote: Arthur and Dan:

This is a friendly reminder of our request for proposed dates for Ms. Otuska's deposition. As we informed you yesterday, we require dates of availability by the close of business today. Otherwise, we will notice Ms. Otsuka's deposition without your input as to date.

#### Alisha

From: Louie, Alisha M. (Assoc-SV-LT)
Sent: Tuesday, April 29, 2008 3:00 PM
To: arthur kim; 'danfeder@pacbell.net'

Cc: Goines, William (Shid-SV-LT); Patrick R. Kitchin; Meier, Jeremy (Assoc-Sac-LT)

Subject: RE: Otsuka v. Polo - deposition scheduling

#### Arthur:

We have been patiently awaiting a new date for Ms. Otsuka's deposition in light of our agreement to continue her deposition. We require a proposed date for Ms. Otsuka's deposition by the close of business tomorrow, April 30, 2008. Should you fail to provide us with a date, we will notice Ms. Otsuka's deposition for a convenient date that complies with the procedural requirements of the Federal Rules.

We hope you will cooperate with this request and we look forward to your response.

Alisha

From: arthur kim [mailto:akimhaiti@gmail.com]

Sent: Monday, April 28, 2008 6:52 PM To: Louie, Alisha M. (Assoc-SV-LT)

Cc: danfeder@pacbell.net; Goines, William (Shld-SV-LT); prk@investigationlogic.com

Subject: Re: Otsuka v. Polo - deposition scheduling

# Alisha:

I can't give you any dates right now because I am still waiting to hear back from our client.

#### Arthur

On Mon, Apr 28, 2008 at 5:46 PM, <<u>LouieA@gtlaw.com</u>> wrote:

We request your response to this e-mail so that we may coordinate the re-scheduling of Ann Otsuka's deposition. Please contact me with proposed dates for Ms. Otsuka's deposition.

Thank you.

#### Alisha M. Louie

Greenberg Traurig, LLP | Silicon Valley Office 1900 University Avenue, 5th Floor | East Palo Alto, CA 94303 tel 650.289.7876 | fax 650.462.7876 | jouiea@gtlaw.com

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From: Louie, Alisha M. (Assoc-SV-LT)

Sent: Wednesday, April 30, 2008 11:40 AM

To: arthur kim; 'danfeder@pacbell.net'

Cc: Goines, William (Shld-SV-LT); Meier, Jeremy (Assoc-Sac-LT); Patrick R. Kitchin

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From: Louie, Alisha M. (Assoc-SV-LT)

Sent: Monday, April 28, 2008 5:47 PM

To: akimhaiti@gmail.com; 'danfeder@pacbell.net'

Cc: Goines, William (Shld-SV-LT); 'Patrick R. Kitchin'

Subject: Otsuka v. Polo - deposition scheduling

#### Arthur and Dan:

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#### Alisha M. Louie

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Goines, William (Shld-SV-LT) From: Sent: Sunday, April 27, 2008 9:44 AM

To: 'arthur kim',

Subject: RE: Ann Otsuka's Deposition

# Arthur let's talk on Monday as I need to get a date. Thanks.

#### William J. Goines

Greenberg Traurig, LLP Silicon Valley Office 1900 University Avenue, 5th Floor East Palo Alto, CA 94303

Direct: 650-289-7860 Phone: 650-328-8500 x:7860 Direct Fax: 650-462-7860 goinesw@gtlaw.com www.gtlaw.com

From: arthur kim [mailto:akimhaiti@gmail.com]

Sent: Thursday, April 24, 2008 11:43 AM

To: Goines, William (Shld-SV-LT)

Cc: Dan Feder

Subject: Re: Ann Otsuka's Deposition

Yes. It will depend on her schedule, but I will be defending her deposition and my schedule is free.

### Arthur

On Thu, Apr 24, 2008 at 11:16 AM, <goinesw@gtlaw.com> wrote:

Thanks Arthur. Are we at least planning on doing her depo the following week?

#### William J. Goines

Greenberg Traurig, LLP Silicon Valley Office 1900 University Avenue, 5th Floor East Palo Alto, CA 94303

Direct: 650-289-7860 Phone: 650-328-8500 x:7860 Direct Fax: 650-462-7860 goinesw@gtlaw.com www.gtlaw.com

From: arthur kim [mailto:akimhaiti@gmail.com]

Sent: Thursday, April 24, 2008 11:10 AM

To: Goines, William (Shld-SV-LT)

Cc: Dan Feder

Subject: Re: Ann Otsuka's Deposition

Mr. Goines:

I'm sorry, but I haven't heard back from our client yet. I will get back to you as soon as we do.

#### Arthur

On Thu, Apr 24, 2008 at 9:29 AM, <goinesw@gtlaw.com> wrote: Arthur any update? I would like to get a new date pinned down given our upcoming briefing schedule.

William J. Goines Greenberg Traurig, LLP Silicon Valley Office 1900 University Avenue, 5th Floor East Palo Alto, CA 94303 Direct: 650-289-7860

Phone: 650-328-8500 x:7860 Direct Fax: 650-462-7860 qoinesw@gtlaw.com www.gtlaw.com

From: arthur kim [mailto:akimhaiti@gmail.com] Sent: Tuesday, April 22, 2008 10:42 AM

To: Goines, William (Shld-SV-LT) Subject: Re: Ann Otsuka's Deposition

I will get back to you as soon as I hear back from our client.

On Tue, Apr 22, 2008 at 8:12 AM, <goinesw@gtlaw.com> wrote:

Arthur thanks. That would be great as I can take care of something I need to do on the 30th. I am available any day the following week except Monday. Please confirm what day works for you and Ms. Otsuka. I will be with Patrick Kitchen tomorrow in Chicago for the Harvey Resnick depo and would like to firm up a date then. Thanks again.

William J. Goines

Sent from my wireless handheld.

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From: arthur kim [mailto:akimhaiti@gmail.com]

Sent: Monday, April 21, 2008 05:38 PM Pacific Standard Time

Goines, William (Shld-SV-LT)

prk@investigationlogic.com; Dan Feder Cc:

Ann Otsuka's Deposition Subject:

Mr. Goines:

We are agreeable to rescheduling the deposition of Ms. Otsuka for the week after. We will get back to you with dates.

Arthur Kim Law Offices of Daniel Feder

----Original Message----

From: Goines, William (Shld-SV-LT)

Sent: Thursday, April 24, 2008 11:45 AM

To: 'arthur kim'

Subject: RE: Ann Otsuka's Deposition

Thanks Arthur. Please let me know what date works.

#### William J. Goines

Greenberg Traurig, LLP Silicon Valley Office 1900 University Avenue, 5th Floor

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Sent:

Monday, April 28, 2008 5:22 PM

To:

Louie, Alisha M. (Assoc-SV-LT)

Subject: FW: Ann Otsuka's Deposition

Here is Arthur's email. Please make sure Patrick knows we are rescheduling it for next week.

#### William J. Goines

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Sent:	Goines, William (ShId-SV-LT)
To:	Tuesday, April 22, 2008 1:16 PM 'arthur kim'
Subject:	RE: Re: Ann Otsuka's Deposition
	Tel. 1 (c. 7 dir Otsaka a Deposition
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WilliamJ.Goind Sent from my w	es wireless handheld.
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From: a: Sent: Tuesdav	thur kim [mailto:akimhaiti@gmail.com] April 22, 2008 10:42 AM Pacific Standard Time
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administrato	r directly, please send an email to mailto:postmaster@gtlaw.com.
•	
	ur kim [mai]to.akimbaiti@
Sent: Mond	ur kim [mailto:akimhaiti@gmail.com]
To: Goin	ay, April 21, 2008 05:38 PM Pacific Standard Time es, William (Shld-SV-LT)
Cc: prk@	investigationlogic.com; Dan Feder
Subject:	Ann Otsuka's Deposition
Mr. Goines:	

> We are agreeable to rescheduling the deposition of Ms. Otsuka for the

> week after. We will get back to you with dates.
>
> Arthur Kim
> Law Offices of Daniel Feder
>
> ----Original Message----

From:	Goines, William (Shld-SV-LT)
Sent:	Tuesday, April 22, 2008 8:12 AM
To:	'arthur kim',
Subject:	RE: Ann Otsuka's Deposition

Arthur thanks. That would be great as I can take care of something I need to do on the 30th. I am available any day the following week except Monday. Please confirm what day works for you and Ms. Otsuka. I will be with Patrick Kitchen tomorrow in Chicago for the Harvey Resnick depo and would like to firm up a date then. Thanks again.

WilliamJ.Goines

Sent from my wireless handheld.

----Original Message----

From: arthur kim [mailto:akimhaiti@gmail.com]

Sent: Monday, April 21, 2008 05:38 PM Pacific Standard Time

To: Goines, William (Shld-SV-LT)

Cc: prk@investigationlogic.com; Dan Feder

Subject: Ann Otsuka's Deposition

Mr. Goines:

We are agreeable to rescheduling the deposition of Ms. Otsuka for the week after. We will get back to you with dates.

Arthur Kim Law Offices of Daniel Feder

From: Goines, William (Shld-SV-LT)
Sent: Monday, April 21, 2008 5:41 PM

To: 'arthur kim'

Subject: RE: Ann Otsuka's Deposition

Arthur it may not be necessary. I will confirm tomorrow.

### William J. Goines

Greenberg Traurig, LLP Silicon Valley Office 1900 University Avenue, 5th Floor East Palo Alto, CA 94303

Direct: 650-289-7860
Phone: 650-328-8500 x:7860
Direct Fax: 650-462-7860
goinesw@gtlaw.com
www.gtlaw.com

From: arthur kim [mailto:akimhaiti@gmail.com]

Sent: Monday, April 21, 2008 5:39 PM

To: Goines, William (Shld-SV-LT)

Cc: prk@investigationlogic.com; Dan Feder

Subject: Ann Otsuka's Deposition

### Mr. Goines:

We are agreeable to rescheduling the deposition of Ms. Otsuka for the week after. We will get back to you with dates.

Arthur Kim

Law Offices of Daniel Feder

From: Goines, William (Shld-SV-LT)

Monday, April 21, 2008 4:44 PM Sent:

To: 'Patrick R. Kitchin'

Subject: RE: Polo

I will see you in Chicago. I will track down the Notice for Ann, but I think it is set for 9:30.

#### William J. Goines

Greenberg Traurig, LLP Silicon Valley Office 1900 University Avenue, 5th Floor East Palo Alto, CA 94303

Direct: 650-289-7860 Phone: 650-328-8500 x:7860 Direct Fax: 650-462-7860 goinesw@gtlaw.com www.gtlaw.com

From: Patrick R. Kitchin [mailto:prk@investigationlogic.com]

Sent: Monday, April 21, 2008 4:42 PM To: Goines, William (Shld-SV-LT) Cc: mmq@hudqinslaw.com

Subject: RE: Polo

Bill,

The 30th is fine with me. What time are you going to begin?

Are you going to attend the Resnick depo at your Chicago office?

#### Patrick

The Law Office of Patrick R. Kitchin 565 Commercial Street, 4th Floor San Francisco, CA 94111 Phone: (415) 677-9058

Fax: (415) 627-9076 www.kitchinlegal.com

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From: goinesw@gtlaw.com [mailto:goinesw@gtlaw.com]

Sent: Monday, April 21, 2008 4:30 PM

To: goinesw@gtlaw.com; Patrick R. Kitchin; danfeder@pacbell.net

Cc: LouieA@gtlaw.com Subject: RE: Polo

Not having heard from you on the below message we are planning on going forward with Ms. Otsuka's deposition on April 30 in our office.

William J. Goines Greenberg Traurig, LLP Silicon Valley Office

1900 University Avenue, 5th Floor East Palo Alto, CA 94303

Direct: 650-289-7860 Phone: 650-328-8500 x:7860 Direct Fax: 650-462-7860 goinesw@gtlaw.com www.gtlaw.com

From: Goines, William (Shld-SV-LT)

Sent: Thursday, April 17, 2008 12:20 PM

To: 'Patrick R. Kitchin'; danfeder@pacbell.net

Cc: Louie, Alisha M. (Assoc-SV-LT)

Subject: Polo

Patrick and Dan we have the deposition of Ann Otsuka set for April 30. Is there any way we can do it during the following week. I have just had a matter arise that will require attendance on April 30. Kindly let me know. Thanks for your consideration.

#### William J. Goines

Greenberg Traurig, LLP Silicon Valley Office 1900 University Avenue, 5th Floor East Palo Alto, CA 94303 Direct: 650-289-7860

Phone: 650-328-8500 x:7860 Direct Fax: 650-462-7860 goinesw@gtlaw.com www.gtlaw.com

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